

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>In the Matter of:</b>	)	
	)	<b>Case No.:</b> 2:25-mj-34
<b>United States of America</b>	)	
<b>v.</b>	)	
<b>Adalberto C. Tolentino</b>	)	<b>Magistrate Judge Vascura</b>
	)	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brandon Edwards, a Special Agent with Homeland Security Investigations, being duly sworn, hereby depose and state:

1. I, Special Agent Brandon Edwards (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of Title 8 United States § 1324(a)(1)(A)(ii)–Transporting Illegal Aliens. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. The statements contained in this affidavit are based in part on information and analysis provided by law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of subpoenas and execution of search warrants; interview(s); and my experience, training and background as a Special Agent. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Adalberto C. Tolentino committed the violations listed above.
2. I am a Special Agent (SA) of Homeland Security Investigations (HSI), assigned to the Office of the Assistant Special Agent in Charge, Columbus, Ohio since September 2019. As a HSI Special Agent, your affiant has completed the Federal Criminal Investigator Training Program (CITP) and the HSI Special Agent Training Academy. During CITP and the HSI Academy training, your affiant was instructed in all phases of criminal investigations such as: Criminal Law, Immigration, Human Smuggling, Search and Seizure, Investigative Techniques, Firearms Proficiency, and Evidence Handling. Your affiant has led and participated in numerous investigations of crimes involving drug smuggling, firearms trafficking, fraud, and other violations including immigration. Prior to becoming a Special Agent with HSI, your Affiant was employed by the National Security Agency (NSA) as a Special Agent in Maryland, and as an employee with the Federal Bureau of Investigation (FBI) in the Denver, Colorado Field Office. Moreover, I am a federal law enforcement officer who is engaged in enforcing federal criminal laws, including 8 U.S.C. § 1324, and I am authorized by law to request a criminal complaint.

**FACTS SUPPORTING PROBABLE CAUSE**

3. On January 23, 2025 investigators with the Licking County Sheriff's Office (LCSO) received information from a United States Custom Border Patrol (CBP) Agent located in Southern Arizona, that a vehicle described as a Toyota Highlander with Arizona license plate: 8SA03P (the TARGET VEHICLE) is involved with alien smuggling. This registration was entered into a license plate reader system (LPR), and on January 23, 2025 the TARGET VEHICLE was captured by the LPR system east of St. Louis at 0813 hours. At 1306 hours the TARGET VEHICLE was captured by the LPR system on Interstate 70 traveling eastbound near the Ohio and Indiana state line.
4. While conducting surveillance on Interstate 70 east of State Route 310, LCSO investigators observed the TARGET VEHICLE traveling in the slow lane. Investigators continued to observe it at a distance as it continued east through Licking County. LCSO Detective Vogelmeier surveilled the TARGET VEHICLE as it traveled through Zanesville, and once it was east of Zanesville, LCSO Detective Vogelmeier aired on the radio that he observed a marked lanes violation (Ohio Revised Code 4511.33) near the area of mile marker 160. With this traffic violation observed, LCSO Detective Martens caught up with the vehicle and initiated a traffic stop in the area of Interstate 70 and State Route 22. The TARGET VEHICLE was slow to pull to the right side of the road, and once stopped LCSO Detective Martens made a passenger side approach.
5. Once at the passenger window LCSO Detective Martens observed a Hispanic male driver, and two Hispanic males in the back seat. LCSO Detective Martens stated the reason for the stop and the driver stated that he didn't speak any English. He then provided a California driver's license. Investigators were unable to confirm if the presented license was valid but did confirm the biographical data on it was incorrect. The driver was asked to step out of the vehicle. LCSO Detective Martens asked for consent to search the driver's person, before placing him in the back of his marked vehicle. While searching his person LCSO Detective Martens located an envelope containing numerous one-hundred-dollar bills. LCSO Detective Martens asked the driver, later identified as Adalberto Calixto TOLENTINO, as to where he got the money. He stated that he got it "from working." LCSO Detective Martens asked as to how much currency was there, and TOLENTINO stated approximately eight to nine thousand dollars. TOLENTINO was the only occupant of the vehicle who was in possession of a phone.
6. While in the back of a marked police vehicle, LCSO Detective Martens used Google Translate to speak to TOLENTINO. LCSO Detective Martens asked TOLENTINO as to where he was coming from and going to, to which he replied he was coming from Arizona and headed to Pennsylvania. LCSO Detective Martens then asked as to who the other subjects were in the vehicle, to which he stated that they were his friends and he had worked with them for a short time. Investigators then asked what his friend's names were, and TOLENTINO stated that he did not know.
7. A total of four passengers were observed getting out of the TARGET VEHICLE back seat. None of the passengers had any forms of United States identification documents.
8. Your affiant and Immigration and Customs (ICE) Enforcement and Removal Operations (ERO) Officer Wissel responded to the scene. Officer Wissel translated in person while ICE ERO Officer Shantal Translated via telephone. It was determined that all five people found in the TARGET VEHICLE entered the United States without inspection and were illegally present.

9. All five occupants were taken into custody for further processing at the ICE office located in Westerville, Ohio.
10. Julio REYEIS-Jimenez was interviewed by HSI SA Edwards and SA Myers with a translator via telephone. REYEIS was read his Miranda Rights and after waiving them, agreed to speak with investigators.
11. REYEIS stated that he paid \$10,000 in order to be helped crossing the border of Mexico into the United States and be transported to New York. He stated that he crossed the United States boarder in Arizona on approximately January 20, 2025. Once across the border, REYEIS walked for approximately 30 minutes in the desert where he met a male driving a pick-up truck. The truck then drove him to Phoenix, Arizona where he was taken to a house for approximately a few hours before then being driven again, this time by TOLENTINO, for approximately 6 hours. REYEIS stated that he was unaware where he was after leaving the Phoenix area. Once arriving to the unknown location, REYEIS stated that the group then switched vehicles to the Toyota Highlander that investigators stopped in Ohio. Along the route, REYEIS stated that they stopped and that a male was dropped off. REYEIS stated that this male gave TOLENTINO what appeared to be a large amount of cash. REYEIS stated that he believes TOLENTINO to be involved with a human smuggling group.
12. SA Edwards and SA Powers then conducted a custodial interview of TOLENTINO via a translator on the phone. After agreeing to waive his rights, TOLENTINO stated that he was driving to Harrisburg, Pennsylvania to look for work clearing snow. TOLENTINO stated that he works in "framing" and landscaping but that work in Arizona was down. When asked why he had approximately \$8,000 in cash in an envelope on his person, TOLENTINO stated that he had just sold his truck and that he was driving to Pennsylvania to look for a new vehicle to purchase. When investigators asked who owned the Toyota Highlander that TOLENTINO was stopped in, TOLENTINO stated that it was a friends. SA Edwards asked what the friend's name was, and TOLENTINO stated that he does not know the friend's real name and only knows his nickname. TOLENTINO then invoked his rights to speak to an attorney and the interview concluded.
13. Based upon the above information, your affiant submits that there is probable cause to believe that Adalberto C. TOLENTINO has committed offenses in violation of Title 8 United States § 1324(a)(1)(A)(ii)–Transporting Illegal Aliens. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

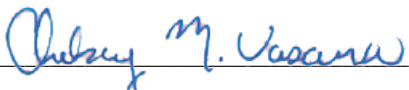
**BRANDON**  
**G EDWARDS**

Digitally signed by  
BRANDON G EDWARDS  
Date: 2025.01.24  
10:12:28 -05'00'

---

Brandon Edwards  
Special Agent  
Homeland Security Investigations

Sworn and subscribed to before me this 24<sup>th</sup> day of January, 2025.

  
\_\_\_\_\_

Chelsey M. Vascura

Magistrate Judge

U.S. District Court for the Southern District of Ohio